T1506M [redacted] 4/3/98

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

MAR 30 1998

Food and Drug Administration
2098 Gaither Road
Rockville MD 20850

WARNING LETTER

VIA FEDERAL EXPRESS

Mr. Tadashi Honkawa
General Manager
Hitachi, Ltd. Instrument Division
882, Ichige, Hitachinaski-shi
Ibaraki-ken, 312 Japan

Dear Mr. Honkawa:

During an inspection of your firm located in Ibaraki-kin, Japan, on December 1-5, 1997, Food and Drug Administration (FDA) Investigator Ta determined that your firm manufactures In Vitro Diagnostic analyzers intended for use in clinical chemistry and immunology. These analyzers are devices as defined by section 201(h) of the Federal Food, Drug, and Cosmetic Act (the Act).

The above-stated inspection revealed that your devices are adulterated within the meaning of section 501(h) of the Act, in that the methods used in, or the facilities or controls used for manufacturing, packaging, storage, or installation are not in conformance with the current good manufacturing practice (CGMP) requirements of the Quality System Regulation (QS Regulation), as specified in Title 21, Code of Federal Regulations (CFR), Part 820. The 1978 Good Manufacturing Practices (GMP) regulation was superseded on June 1, 1997, by the QS Regulation. Since some of the records reviewed at your firm were dated prior to June 1, 1997, the deficiencies noted during the inspection are cross referenced to the 1978 GMP's. We have not received a response from you regarding the inspectional observations noted on the FDA 483.

1. Failure to establish and maintain procedures for implementing corrective and preventive action, as required by 21 CFR 820.100(a)(4). This would be a violation of the 1978 Good Manufacturing Practices Regulation, 21 CFR 820.162, inadequate failure investigation. For example, software release versions were not documented as required or verified to demonstrate that the revisions to the software corrected the problem. Additional deficiencies pertaining to corrective and preventative action include the following:

   a. inadequate corrective action to address a recurring software problem with the BM/Hitachi 917 analyzers, resulting in four problem reports to the firm;

b. inadequate corrective action and lack of purchasing controls to address a high field failure rate of the photo interruptors, a sensor component commonly used in all analyzers;

c. inadequate review of the device master records which resulted in the issuance of incorrect device specifications for field modifications; and

d. inadequate review of the device master records and device history records to assure correct specifications were approved and released to production floor and to the field.

2. Failure to develop, conduct, control, and monitor production processes to ensure that a device conforms to its specifications, as required by 21 CFR 820.70(a)(1). This would be violation of the 1978 Good Manufacturing Practices Regulation, 21 CFR 820.100(a)(1), specification controls. For example, [redacted] has not been validated by adequate means of test data to assure that the heating process does not degrade this electronic component.

3. Failure to document oral complaints as required by 21 CFR 820.198(a)(2), complaint files. This is the same cite as in the 1978 Good Manufacturing Practices Regulation, 21 CFR 820.198, complaint files. For example, oral complaints and service data concerning a high field failure rate of the floppy disc drives were not classified and documented as complaints.

This letter is not intended to be an all inclusive list of deficiencies at your facility. It is your responsibility to ensure adherence to each requirement of the Act and regulations.

The specific violations noted in this letter and the form, FDA 483, issued at the close of the inspection may be symptomatic of serious underlying problems in your firm's manufacturing and quality assurance systems. You are responsible for investigating and determining the causes of the violations identified by the Food and Drug Administration (FDA). If the causes are determined to be systems problems, you must promptly initiate permanent corrective actions. Federal agencies are advised of the issuance of all Warning Letters about devices so that they may take this information into account when considering the award of contracts.

Please notify this office, in writing, within 15 working days of receipt of this letter of the specific steps you have taken to correct the noted violations, including an explanation of each step being taken to identify and make corrections to any underlying systems problems necessary to assure that similar violations will not recur. Please include any and all documentation to show that adequate correction has been achieved. In the case of future corrections, an estimated date of completion, and documentation showing plans for correction should be included with your response to this letter.

Your response should be sent to the Food and Drug Administration, Center for Devices and Radiological Health, Office of Compliance, Division of Enforcement I, In Vitro Diagnostic Devices Branch, HFZ-321, 2098 Gaither Road, Rockville, MD 20850, to the attention of Broden Staples.

Should you require any assistance in understanding the contents of this letter, please contact Mr. Staples at the above letterhead address, or telephone (301) 594-4588, ext. 166, or fax at (301) 594-4636.

Sincerely yours,

Lillian J. Gill

Lillian J. Gill
Director
Office of Compliance
Center for Devices and
Radiological Health